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7 Attorneys for Defendants

8 **UNITED STATES DISTRICT COURT**

9 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

10
11 ALEX VILLANUEVA,

12 Plaintiff,

13 v.

14 COUNTY OF LOS ANGELES,
COUNTY OF LOS ANGELES
15 SHERIFF'S DEPARTMENT, LOS
ANGELES COUNTY BOARD OF
16 SUPERVISORS, COUNTY EQUITY
OVERSIGHT PANEL, LOS
17 ANGELES COUNTY OFFICE OF
INSPECTOR GENERAL,
18 CONSTANCE KOMOROSKI,
MERCEDES CRUZ, ROBERTA
19 YANG, LAURA LECRIVAIN,
SERGIO V. ESCOBEDO, RON
20 KOPPERUD, ROBERT G. LUNA,
MAX-GUSTAF HUNTSMAN,
21 ESTHER LIM, and DOES 1 to 100,
inclusive,
22

23 Defendants.

CASE NO. 2:24-cv-04979 SVW (JCx)

**JOINT RULE 26(F) REPORT AND
PROPOSED DISCOVERY PLAN**

Assigned to the Hon. Stephen V.
Wilson and Magistrate Judge Jacqueline
Chooljian

Trial Date: June 3, 2025

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ATTORNEYS AT LAW
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1 The parties, by and through their respective counsel, respectfully submit their
2 Joint Rule 26(f) Report and Discovery Plan as contemplated by Federal Rules of
3 Civil Rule Procedure Rule 26(f) and Local Rule 26-1.

4 **I. ITEMS REQUIRED BY FRCP 26(F)**

5 **A. Meeting of Counsel**

6 On December 17, 2024, the parties' counsel conferred pursuant to Federal Rule
7 of Civil Procedure 26(f)(2) and have worked cooperatively since then on this Joint
8 Rule 26(f) Report and Discovery Plan.

9 **B. Rule 26(a) Initial Disclosures**

10 The parties do not believe there should be any changes made in the timing,
11 form, or requirement for Initial Disclosures under Rule 26(a). The parties will
12 exchange disclosures on January 7, 2025.

13 **C. Discovery Issues**

14 No discovery has been taken to date. The parties have agreed that fact
15 discovery shall not be conducted in phases. The parties will adhere to the scope of
16 discovery set out in Rule 26(b).

17 The parties do not presently anticipate any unusual issues in discovery
18 requiring orders from the Court currently.

19 The parties' joint scheduling proposal, including for the completion of
20 discovery, is attached hereto as Exhibit A.

21 **D. Electronically Stored Information**

22 The parties are not aware of any issues regarding disclosure, discovery or
23 preservation of electronically stored information requiring orders from the Court
24 currently. The Parties agree that they will meet and confer as appropriate should
25 any issues arise.

26 **E. Privileged Material**

27 The parties agree to follow the procedures set forth in the Federal Rule of
28 Civil Procedure 26(b)(5)(B) with respect to disclosures of privileged materials.

1 **F. Limitations on Discovery**

2 The parties do not anticipate changes to the limitations on discovery imposed
3 by the Federal and Local Rules.

4 **G. Other Discovery Orders**

5 The parties contemplate submitting a proposed protective order pursuant to
6 Rule 26(c) and request that the Court enter the parties' scheduling proposal
7 pursuant to Rule 16(b).

8 **II. ITEMS REQUIRED BY LOCAL RULE 26**

9 **A. Complex Designation**

10 The parties do not believe the procedures of the Manual for Complex
11 Litigation should be utilized in this case.

12 **B. Motion Schedule**

13 The parties' joint scheduling proposal, including for the filing of dispositive or
14 partially dispositive motions, is attached hereto as Exhibit A.

15 **C. ADR**

16 The Parties are meeting on conferring on Alternative Dispute Resolution
17 options.

18 **D. Trial Estimate**

19 The parties preliminarily estimate the trial will take a total of no more than ten
20 (10) Court days.

21 **E. Additional Parties**

22 The parties do not anticipate any additional parties joining this suit, either by
23 motion of the parties or by third parties seeking to join of their own accord.

24 **F. Expert Witnesses**

25 The parties' joint scheduling proposal, including relating to the disclosure of
26 expert witnesses, is attached hereto as Exhibit A. The Parties request the Court
27 enter the parties' scheduling proposal pursuant to Rule 16(b).
28

1 DATED: February 5, 2025

Respectfully Submitted,

2 MILLER BARONDESS, LLP

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5 By: /s/ Jason H. Tokoro

6 JASON H. TOKORO

Attorneys for Defendants

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8 DATED: February 5, 2025

Respectfully Submitted,

9 SHEGERIAN & ASSOCIATES, INC.

10
11
12 By: /s/ Carney R. Shegerian

CARNEY R. SHEGERIAN

Attorneys for Plaintiff

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EXHIBIT A – PARTIES’ JOINT PROPOSED SCHEDULE¹

Deadline/Event	Date
<u>Discovery and Expert Disclosures</u>	
Fact Discovery Cutoff	April 18, 2025
Expert Witness Disclosure	March 21, 2025
Rebuttal Expert Disclosure	April 4, 2025
Expert Discovery Cutoff	April 21, 2025
<u>Summary Judgment/Adjudication</u>	
Dispositive Motions (including <i>Daubert</i>)	April 21, 2025
Oppositions	April 28, 2025
Replies	May 5, 2025
Hearing	May 19, 2025
<u>Trial Preparation and Trial</u>	
Motions in Limine	April 28, 2025
Motion in Limine Oppositions	May 5, 2025
Motion in Limine Replies	May 12, 2025
Pre-Trial Filings (Joint Final Pre-Trial Conference Proposed Order, Exhibit List, Witness List, Memorandum of Contentions of Fact and Law. Jury Instructions)	May 20, 2025
Hearing on Motions in Limine	May 26, 2025
Final Pre-Trial Conference	May 27, 2025
Trial	June 3, 2025

¹ Any other deadlines pursuant to the Federal Rules of Civil Procedure, Local Rules, and the Court’s orders.

CERTIFICATE OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 2121 Avenue of the Stars, Suite 2600, Los Angeles, CA 90067.

On February 5, 2025, I served true copies of the following document(s) described as:

JOINT RULE 26(F) REPORT AND PROPOSED DISCOVERY PLAN

on the interested parties in this action as follows:

Carney R. Shegerian
Mahru Madjidi

Attorneys for Plaintiff
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BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent from e-mail address aalamango@millerbarondess.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on February 5, 2025, at Los Angeles, California.

/s/ Alexandria Alamango
Alexandria Alamango

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